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March 18, 2022

**VIA ECF**

Honorable Esther Salas  
United States District Judge  
Lautenberg U.S. Post Office & Courthouse  
Federal Square  
Newark, New Jersey 07102

**Re: *Zinger et al. v. Ben & Jerry's Homemade, Inc. et al*,  
2:22-cv-01154-ES-JBC**

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Dear Judge Salas:

This firm is co-counsel, along with Cravath, Swaine & Moore LLP, for defendants Ben & Jerry's Homemade, Inc., Unilever United States, Inc., and Conopco, Inc. ("Defendants") in the above-captioned matter. As discussed earlier today with Your Honor's Courtroom Deputy, we write in connection with the Text Order entered on the docket this morning (D.E. No. 10) in response to Defendants' letter request filed yesterday ("Defendants' March 17 Letter") (D.E. No. 7).

Defendants' March 17 Letter requested an extension of the briefing schedule for Plaintiffs' Motion for preliminary injunctive relief (the "Motion") (D.E. No. 4). As noted, the requested extension was made with Plaintiffs' consent. In connection with that request, the Court ordered Defendants to file a request for an automatic extension from the Clerk pursuant to Local Rule 6.1(b). As discussed with Your Honor's Courtroom Deputy, because the Defendants' requested extension relates to a motion and not to an answer to the complaint with respect to which Local Rule 6.1(b) would apply, Defendants are re-submitting their request.

As set forth in Defendants' March 17 Letter, Plaintiffs' Motion was filed on March 11, 2022 and is currently returnable on April 4, 2022. Pursuant to Rule 7.1(d), Defendants' opposition to the Motion is currently due on March 21, 2022, and Plaintiffs' reply is currently due on March 28, 2022. With Plaintiffs' consent,

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Defendants request a short extension of the briefing schedule in connection with this Motion, extending Defendants' deadline to oppose the Motion to March 29, 2022, and extending Plaintiffs' reply deadline to April 5, 2022. Because Plaintiffs' counsel is unavailable from April 13, 2022 until April 24, 2022, the parties request that the return date for the Motion be set for April 12, 2022, or an alternate date that pleases the Court.

Defendants therefore respectfully ask the Court to approve this briefing schedule. This is the first extension sought by any party.

If the foregoing meets with Your Honor's approval, we respectfully request that the Court "So Order" this letter in the space indicated below. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact us. Thank you very much for your consideration of this request.

Respectfully submitted,

s/ Jennifer A. Hradil  
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So Ordered: \_\_\_\_\_  
Hon. Esther Salas, U.S.D.J.

cc: All Counsel (by ECF)